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 45 (Thailand) Co., Ltd., NAT Peripheral (Dong  
 46 Guan) Co., Ltd., and NAT Peripheral (H.K.)  
 47 Co., Ltd.*

48 **UNITED STATES DISTRICT COURT**

49 **NORTHERN DISTRICT OF CALIFORNIA**

50 IN RE: HARD DISK DRIVE SUSPENSION  
 51 ASSEMBLIES ANTITRUST LITIGATION

52 Case Nos. 3:19-md-02918-MMC  
 53 3:20-cv-01217-MMC  
 54 MDL No. 2918

55 This Document Relates to:

56 *Seagate Technology LLC et al. v. Headway  
 57 Technologies, Inc. et al., Case No. 3:20-cv-  
 58 01217-MMC*

59 **STIPULATION AND [PROPOSED]  
 60 ORDER EXTENDING DEADLINE  
 61 FOR LETTER BRIEFS ON  
 62 SEAGATE'S CHALLENGE UNDER  
 63 STIPULATED PROTECTIVE  
 64 ORDER (ECF NO. 136)**

65 Hon. Maxine M. Chesney

1           WHEREAS, by letter on July 12, 2024, Seagate Plaintiffs<sup>1</sup> raised challenges under § 6 of  
 2 the Stipulated Protective Order (ECF No. 136) to certain of NHK Defendants'<sup>2</sup> confidentiality  
 3 designations, to which NHK Defendants responded on July 24, 2024;

4           WHEREAS, the parties continue to meet and confer and engage in good faith discussions,  
 5 and have not yet concluded that the meet and confer process will not resolve their dispute;

6           WHEREAS, pursuant to the Stipulated Protective Order, if the parties cannot resolve a  
 7 challenge to confidentiality designations without court intervention, the parties shall file and serve  
 8 simultaneous letter briefs within 28 days of the initial notice of the challenge or within 14 days of  
 9 the parties agreeing that the meet and confer process will not resolve their dispute, whichever is  
 10 earlier, *see* ECF No. 136 § 6.3. As such, the parties' simultaneous letter briefs are currently due  
 11 on August 9, 2024;

12           WHEREAS, NHK Defendants and Seagate Plaintiffs (collectively, "Stipulating Parties")  
 13 have agreed to a modest extension of time for the parties to file simultaneous letter briefs on  
 14 Seagate Plaintiffs' challenges to NHK Defendants' confidentiality designations, should the  
 15 Stipulating Parties require court intervention to resolve the dispute. The Stipulating Parties agree  
 16 that such an extension is necessary in light of their ongoing meet and confer efforts.

17           **IT IS HEREBY STIPULATED**, by the undersigned counsel on behalf of the  
 18 Stipulating Parties, that the Stipulating Parties' simultaneous letter briefs concerning Seagate  
 19 Plaintiffs' challenges to NHK Defendants' confidentiality designations under § 6 of the Stipulated  
 20 Protective Order shall be due on **August 29, 2024**, should the parties require court intervention to  
 21 resolve the dispute.

22 **IT IS SO ORDERED.**

23 Dated: August 9, 2024

  
 HONORABLE MAXINE M. CHESNEY  
 UNITED STATES DISTRICT JUDGE

25           <sup>1</sup> "Seagate Plaintiffs" refers collectively to Plaintiffs Seagate Technology LLC, Seagate  
 26 Technology (Thailand), Ltd., Seagate Singapore International Headquarters Pte. Ltd., and Seagate  
 27 Technology International.

28           <sup>2</sup> "NHK Defendants" refers collectively to Defendants NHK Spring Co., Ltd., NHK International  
 Corporation, NHK Spring (Thailand) Co., Ltd., NAT Peripheral (Dong Guan) Co., Ltd., and NAT  
 Peripheral (H.K.) Co., Ltd.

1 Dated: August 8, 2024

Respectfully submitted,

2  
3 /s/ Kenneth R. O'Rourke

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